

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

STONE INTERIORS, INC., d/b/a PRP USA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 08 CV 1158
	)	
CUSTOM INTERIORS, LLC and	)	
	)	
MICHAEL ZAMPIERI IV,	)	
	)	
Defendants.		

**MOTION FOR LEAVE TO FILE AMENDED COMPLAINT INSTANTER**

Plaintiff Stone Interiors, Inc., d/b/a PRP USA (“Stone Interiors”), by and through its attorney, J. Scott Humphrey of Seyfarth Shaw LLP, and pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, requests that this Court grant its Motion for Leave to File Amended Complaint Instanter. In support of this motion, Stone Interiors states:

1. Stone Interiors seeks to recover a money judgment in the amount of \$140,037.23, plus interest and attorneys fees, and to recover all additional costs incurred in this action pursuant to Agreements entered into between Stone Interiors, Custom Interiors and Zampieri in October 2006, November 2006, and October 2007. In addition, Stone Interiors seeks to recover the value of goods it delivered to Custom Interiors that are now believed to be used by Hard Rock without compensation to Stone Interiors.

2. On or about May 6, 2008, Plaintiffs learned that Hard Rock Enterprises, LLC (“Hard Rock”), was owned and operated by the same individuals as Custom Interiors and had received shipments of goods ordered by Custom Interiors through Plaintiff, which to this date have not been paid for.

3. In light of the newly discovered evidence, Stone Interiors seeks leave to amend its complaint to include Hard Rock as a defendant.

WHEREFORE, Plaintiff Stone Interiors, Inc. requests that this Court grant the Motion for Leave to File Amended Complaint Instantly and accept the filing of the attached Amended Complaint.

Respectfully submitted,

STONE INTERIORS, INC., d/b/a PRP USA.

By s/J. Scott Humphrey  
One of Its Attorneys

J. Scott Humphrey, Esq.  
SEYFARTH SHAW LLP  
131 South Dearborn Street, Suite 2400  
Chicago, IL 60603-5577

**CERTIFICATE OF SERVICE**

I, J. Scott Humphrey, an attorney, certify that I caused a true and correct copy of the foregoing Notice of Motion and Motion for Leave to File Amended Complaint Instantly to be served upon:

Mr. Mike Zampieri  
Custom Interiors  
8255 Wards Lane  
Semmes, Alabama 36575

Ms. Sharon K. Beck  
Hard Rock Enterprises LLC  
10023 Lifeline Court  
Mobile, Alabama 36608

by placing in a properly addressed, postage prepaid envelope and deposited in the U.S. Mail at 131 S. Dearborn Street, Chicago, Illinois this 16th day of May, 2008.

s/J. Scott Humphrey